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11 Attorneys for Plaintiff
12 UNITED STATES OF AMERICA

13 UNITED STATES DISTRICT COURT
14 CENTRAL DISTRICT OF CALIFORNIA
15 WESTERN DIVISION

16 UNITED STATES OF AMERICA,

17 No. CV10-4436 GHK (RC)

18 Plaintiff,

19 [PROPOSED] PRELIMINARY
20 INJUNCTION AGAINST DEFENDANTS
21 ELIZABETH AGUILERA AND ALICE
22 YOUNG

23 PETER G. MORRIS, *et al.*

24 Defendants.

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1 After full consideration of plaintiff United States of America's Application for
2 Temporary Restraining Order that the Court has deemed a Motion for Preliminary
3 Injunction, the Court HEREBY ORDERS the following:

4 1. Defendants Elizabeth Aguilera and Alice Young are enjoined and
5 restrained from engaging in the following acts during the pendency of the above-
6 entitled action:

7 (a) acting in any capacity, including, but not limited to, as a real estate
8 agent, salesperson or broker, including but not limited to an agent for buyers ("buyers
9 agent") or sellers ("sellers agent" or "listing agent"), real estate agent, real estate
10 broker, mortgage broker, loan officer, or loan processor, as allowed and defined by
11 California law, including, but not limited to, applicable California licensing authorities
12 and the California Business and Professions Code;

13 (b) selling, offering to sell, buying, offering to buy, soliciting offers to
14 buy, soliciting prospective sellers or purchasers of, soliciting or obtaining listings of,
15 negotiating the purchase, sale, or exchange of real property or any interest or title
16 thereof;

17 (c) selling or offering to sell, buying or offering to buy, or exchanging
18 or offering to exchange, a real property sales contract, or a promissory note secured
19 directly or collaterally by a lien on real property or on a business opportunity, or
20 performing services for the holders thereof;

21 (d) soliciting borrowers or lenders for, or negotiating loans or
22 collecting payments or performing services for borrowers or lenders or note owners in
23 connection with loans secured directly or collaterally by liens on real property or on a
24 business opportunity;

25 (e) using the mails or wire transmissions or causing use of the mail or
26 wire transmissions in connection with any attempt or effort by any individual or entity,
27 including but not limited to any Defendant, to obtain, secure, or apply for any type of

1 mortgage loan, including but not limited to conventional mortgages or any mortgage
2 insured by any federal entity such as the Federal Housing Administration (“FHA”) or
3 Department of Veterans Affairs (“VA”);

4 (f) soliciting or obtaining clients, consumers, individuals, entities or
5 prospective borrowers, for originating, processing, preparing, or otherwise handling
6 any type of mortgage loan, including but not limited to conventional mortgages or any
7 mortgage loan insured by any federal entity, including FHA or VA-insured mortgage
8 loans;

9 (g) originating, processing or preparing, or causing or participating in
10 the origination, processing or preparation of, any type of mortgage loan, including but
11 not limited to conventional mortgages or any insured by any federal entity, including
12 FHA or VA-insured mortgage loans;

13 (h) submitting, or causing to be submitted, any claims for FHA or VA
14 insurance coverage on loans in default;

15 (i) submitting, or causing to be submitted, or participating in any way
16 in any submission for any requests to any type of mortgage loan lender in connection
17 to any type of mortgage loan obligation;

18 (j) engaging in any real estate transactions involving transfers, sales
19 and/or purchases of any real property currently owned by Defendants, or been owned
20 within the last ten (10) years, or any real property currently owned by or that has been
21 owned by within the last ten (10) years by any household family member of
22 Defendants, without the prior approval of the Court; and,

23 (k) destroying, moving, altering, disposing of or in any other fashion
24 failing to maintain business, financial, accounting, real estate and legal records relating
25 to real estate transactions during the past ten (10) years.

26 2. Within five (5) calendar days after the date the Court enters this
27 Preliminary Injunction, Defendants must send via U.S. mail addressed to Assistant
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1 United States Attorneys Indira J. Cameron-Banks and Sekret T. Sneed, United States
2 Attorney's Office, Federal Building, Suite 7516, 300 North Los Angeles Street, Los
3 Angeles, California 90012 a list of all real properties that the Defendant currently is
4 involved with in any capacity, including, but not limited to, as a listing agent, real
5 estate agent and/or real estate broker. To the extent there are no such properties,
6 Defendants must certify that there are none.

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3. Starting on the 30th of each month after the Court enters this Preliminary Injunction, Defendants must send via U.S. mail addressed to Assistant United States Attorneys Indira J. Cameron-Banks and Sekret T. Sneed, United States Attorney's Office, Federal Building, Suite 7516, 300 North Los Angeles Street, Los Angeles, California 90012, an updated list of all real properties that Defendants reported in response to Paragraph 2, to the extent there are any such relevant properties. This reporting requirement shall continue during the pendency of this action.

Dated: 11/18/10

Honorable George H. King
United States District Court Judge

Respectfully submitted,

ANDRÉ BIROTTE JR.
United States Attorney
LEON W. WEIDMAN
Assistant United States
Chief, Civil Division

/S/
INDIRA J. CAMERON-BANKS
Assistant United States Attorney
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